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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

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30 IN RE: SOCIAL MEDIA ADOLESCENT  
31 ADDICTION/PERSONAL INJURY  
32 PRODUCTS LIABILITY LITIGATION

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34 MDL No. 3047

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36 Case No. 4:22-md-03047-YGR-PHK

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38 This Document Relates to:

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40 ALL ACTIONS  
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**SNAP'S OMNIBUS MOTION TO SEAL  
(PLAINTIFFS' OMNIBUS  
OPPOSITION BRIEF AND NON-  
EXHIBIT MATERIALS)**

42  
43 Judge: Hon. Yvonne Gonzalez Rogers  
44 Magistrate Judge: Hon. Peter H. Kang

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1   **I. INTRODUCTION**

2           Recognizing the public's interest in access to judicial records, Snap Inc. ("Snap") seeks to  
 3 seal only a small number of redactions across the entirety of the materials filed by Plaintiffs on  
 4 November 7, 2025, that are subject to this omnibus motion.<sup>1</sup> The redactions are narrowly tailored  
 5 and necessary to prevent disclosure of personal identifying, or otherwise sensitive information.<sup>2</sup>

6           ***First***, Snap moves to seal the names of non-executive employees who are not deponents in  
 7 this case. Sealing this information is necessary to protect the privacy and safety of these individuals.  
 8 See December 10, 2025, Declaration of Jennifer Boden ("Boden Decl."). Moreover, the names of  
 9 these individuals are irrelevant to the issues in this dispute, so sealing them does not meaningfully  
 10 impair the public's interest in access.

11          ***Second***, Snap moves to seal what appear to be first and last names of non-party, non-  
 12 employee individuals found in a small number of records, as their identities are irrelevant to these  
 13 cases and, in some instances, appear alongside sensitive content. See December 10, 2025,  
 14 Declaration of Laura M. Lopez ("Lopez Decl.").

15   **II. LEGAL STANDARD**

16           Where a motion is "more than tangentially related to the merits of a case," portions of the  
 17 briefing and supporting materials may be sealed or redacted where the requesting party provides  
 18 "compelling reasons" for such sealing or redaction. See *Ctr. for Auto Safety v. Chrysler Grp., LLC*,  
 19 809 F.3d 1092, 1096, 1101 (9th Cir. 2016). "What constitutes a 'compelling reason' is 'best left to  
 20 the sound discretion of the trial court.'" *Id.* at 1097 (quoting *Nixon v. Warner Commc'ns, Inc.*, 435  
 21 U.S. 589, 599 (1978)). "Every court has supervisory power over its own records and files, and  
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23          <sup>1</sup> Pursuant to the parties' joint stipulation dated November 17, 2025 this motion concerns Plaintiffs'  
 24 Omnibus Opposition to Defendants' Motions for Summary Judgment (the "Omnibus Opposition  
 25 Brief") and other materials filed by Plaintiffs on November 7, 2025, opposing Defendants' motions  
 26 set for hearing on January 26, 2026, *other than* the exhibits to the Omnibus Opposition Brief. See  
 27 Dkt. No. 2451. The exhibits to the Omnibus Opposition Brief remain subject to a later deadline and  
 28 are not addressed in this motion.

2          <sup>2</sup> In accordance with the Court's Order Setting Sealing Procedures, Dkt. No. 341, the Parties are  
 27 submitting a joint stipulation to address the redaction of Snap's trade secret information and the  
 28 email addresses of Snap's employees.

1 access has been denied where court files might have become a vehicle for improper purposes.”  
 2 *Nixon*, 435 U.S. at 598.

### 3 III. ARGUMENT

#### 4 A. Sealing the Names of Non-Executive, Non-Deponent Employees, and All 5 Employees’ Identifying Information, Is Warranted.

6 Snap seeks to seal only non-executive current and former employee names of those who  
 7 have *not* been deposed to protect employees’ privacy and safety. As this Court has explained,  
 8 “[e]mployees and former employees who are not parties to this litigation have privacy interests in  
 9 their personnel information, and in other sensitive identifying information.” *Murphy v. Kavo Am.*  
 10 *Corp.*, 2012 WL 1497489, at \*1–2 (N.D. Cal. Apr. 27, 2012) (granting motion to seal “employee-  
 11 identifying information”); *see also Foltz v. State Farm Mut. Auto Ins. Co.*, 331 F.3d 1122, 1137 (9th  
 12 Cir. 2003) (acknowledging the privacy interests implicated by personal information when discussing  
 13 sealing). That is particularly true when, as here, the employees are not alleged to be executive  
 14 decision-makers central to the allegations. *See Hunt v. Cont'l Cas. Co.*, 2015 WL 5355398, at \*2  
 15 (N.D. Cal. Sept. 14, 2015) (sealing names because disclosure “implicates important privacy  
 16 concerns of nonparties—whose names are not relevant to the disposition of this case—that outweigh  
 17 the public’s interest in disclosure of these judicial records”). Courts frequently grant motions to seal  
 18 for these reasons. *See, e.g., Am. Auto. Ass’n of N. Cal., Nev. & Utah v. Gen. Motors LLC*, 2019 WL  
 19 1206748, at \*2 (N.D. Cal. Mar. 14, 2019) (sealing “personally identifiable information of third-  
 20 party individuals, including names” to protect privacy and other interests); *Opperman v. Path, Inc.*,  
 21 2017 WL 1036652, at \*4 (N.D. Cal. Mar. 17, 2017) (granting motion to seal the names of non-  
 22 parties under the compelling-reasons standard); *see also, e.g., Zeiger v. WellPet LLC*, 526 F. Supp.  
 23 3d 652, 699 (N.D. Cal. 2021) (same).

24 Further, as explained in the Boden Declaration, publicly disclosing the names of Snap  
 25 employees could expose them to significant safety risks. *See* Boden Decl. ¶¶ 2–4. Boden explains  
 26 that Snap employees whose names become publicly associated with contentious social issues, such  
 27 as the allegations at issue in this MDL, face a heightened risk of harassment, including online threats  
 28 and suspicious calls, messages, or emails. *Id.* ¶ 2. Boden further explains that once an employee’s

1 name is made public, individuals seeking to cause harm can often locate that employee's home  
 2 address or personal contact information, and Snap has, on occasion, been required to implement  
 3 security measures to protect affected employees and their families. *Id.* ¶ 3. In her experience, the  
 4 nature of the allegations in these cases is such that publicly linking individual employees to them  
 5 could reasonably expose those employees to harassment or threats. *Id.* ¶ 4. Finally, none of these  
 6 employees have been deposed, and their names have little to no relationship or relevance to this  
 7 case. Protecting these non-parties' privacy and safety is a compelling reason supporting sealing.  
 8 Cf., e.g., *Campbell v. Grounds*, 2022 WL 14151744, at \*1 (N.D. Cal. Oct. 24, 2022) (recognizing  
 9 compelling reasons to seal information that could endanger individuals if disclosed).

**B. Sealing Information to Protect Non-Parties' Privacy Is Warranted.**

Snap seeks to redact what appear to be the first and last names of non-party, non-employees,  
 including where such information appears alongside sensitive content. These individuals enjoy the  
 same privacy and other interests as the non-party employees and former employees discussed above.  
*See Foltz*, 331 F.3d at 1137 (referring broadly to "third-party" privacy interests in redacting); *Am.*  
*Auto. Ass'n*, 2019 WL 1206748, at \*2 (same); *Opperman*, 2017 WL 1036652, at \*4 (similar). The  
 personal information of these third parties is irrelevant to the issues before the Court and redacting  
 them is necessary to protect these individuals' privacy. *See Lopez Decl.* ¶ 2.

**IV. CONCLUSION**

Snap respectfully requests that the Court grant its omnibus motion to seal, as set out  
 specifically in the accompanying joint stipulation, and submits a proposed order for the Court's  
 consideration.

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1 DATED: December 10, 2025

**MUNGER, TOLLES & OLSON LLP**

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## ATTESTATION

I, Jonathan H. Blavin, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: December 10, 2025

By: /s/ Jonathan H. Blavin  
Jonathan H. Blavin